

The Honorable JAMES L. ROBART

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

LAFECT CAMPBELL, WILLIAM R. BROWN,) CASE NO.: C08-0181 JLR

DANNY CROWDER, JOSE FERREZ, DUANE )

JONES, EDWIN KYLES, DONALD L. MILLS,) )

JR, CORNELL TUNNEY, BERNARD )

WOODS, THURMAN E. YOUNG, JR. WALID )

AL-ADSSANI, GREGORY HILLS, )

PLAINTIFFS, )

VS. )

OBAYASHI CORPORATION, INC., A )

FOREIGN CORPORATION, PARSONS )

BRINCKERHOFF CONSTRUCTION )

SERVICES, INC. D/B/A RCI )

CONSTRUCTION, A DOMESTIC )

CORPORATION AND BALFOUR BEATTY )

RAIL CORPORATION, INC., A FOREIGN )

CORPORATION. )

DEFENDANTS. )

I, LORI S. HASKELL, declare as follows:

1. I represent all the Plaintiffs in the above-captioned matter. I am over the age of 18 years.

DECLARATION OF LORI S. HASKELL  
IN SUPPORT OF MOTION TO WITHDRAW

Law Office of Lori S. Haskell  
Fishermen's Terminal  
1900 W. Nickerson St. #209  
Seattle, WA 98119  
Tel: 206 285 4120

1 I am competent to testify and have personal knowledge of the facts set forth in this  
2 Declaration.

3 2. I have represented a collection of unrelated Plaintiffs in an action where I  
4 believe that the Plaintiffs have common liability evidence and common causes of  
5 action, which arose out of their common work environment.  
6

7 3. Over time, I have devoted considerable time and resources to representing the  
8 Plaintiffs collectively.  
9

10 4. During recent depositions, I became concerned about a potential ethical  
11 dilemma. Upon realization, I did promptly engage in analysis, research and efforts  
12 to resolve the situation.  
13

14 5. I have researched this matter thoroughly to ascertain whether or not I can  
15 ethically continue my representation of all Plaintiffs or any Plaintiff individually. I  
16 have concluded that I cannot continue to represent all or any one Plaintiff. I  
17 believe that I am ethically bound to withdraw from representing all of the  
18 Plaintiffs.  
19

20 6. The following are steps that I have taken to resolve the matter without  
21 withdrawing and what steps I need to take to assure I am within the bounds of the  
22 Rules of Professional Conduct that direct my actions.

23 7. Upon my personal appreciation of the potential ethical dilemma I consulted  
24 several attorneys around the state. Those attorneys have explored a variety of  
25 options with me, but ultimately have advised me that I am ethically bound to  
26 withdraw and that I should consult with the Washington State Bar Association  
27 ethical hotline.  
28

DECLARATION OF LORI S. HASKELL  
IN SUPPORT OF MOTION TO WITHDRAW

Law Office of Lori S. Haskell  
Fishermen's Terminal  
1900 W. Nickerson St. #209  
Seattle, WA 98119  
TEL: 206.285.4120

1 8. I have done research to determine whether the matters could be approached  
2 differently.

3 9. I have consulted with the Washington State Bar Association about the  
4 circumstances and have been advised that I am ethically bound to withdraw.

5 10. During the course of this urgent problem solving process, I have attempted to  
6 find counsel for the plaintiffs that could be substituted as counsel for the Plaintiffs  
7 individually or collectively. As of this date I have been unable to locate substitute  
8 counsels. Additionally, I have advised the clients that they need to secure new  
9 counsels to prosecute their individual causes of action.

10 11. I have begun the process of having all files copied so that they are immediately  
11 available to the Plaintiffs and any potential counsels who wish to review them.

12 12. In consideration of the due process rights of all the Plaintiffs I believe I have  
13 the obligation to secure a continuance of the matter for four to six months, so that  
14 new counsels have time to get up to speed on the case and prepare.

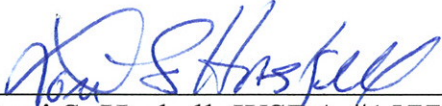
15 13. I will do everything I can to assure a smooth transition to counsels for the  
16 plaintiffs. To expedite the matter and increase the odds that new counsel will  
17 immediately take up the cause of the Plaintiffs, I am waiving all my earned  
18 attorneys fees and will agree to await any reimbursement of the costs advanced  
19 until the matter is resolved.

20 14. Due to the nature of the conflict, in order to abide by the Rules of Professional  
21 Conduct I must withdraw.

22  
23  
24  
25  
26  
27  
28  
DECLARATION OF LORI S. HASKELL  
IN SUPPORT OF MOTION TO WITHDRAW

Law Office of Lori *S. Haskell*  
Fishermen's Terminal  
1900 W. Nickerson St. #209  
Seattle, WA 98119  
Tele 206 285-4130

1 I make the foregoing statement under penalty of perjury under the laws of  
2 the state of Washington and the United States.

3  
4   
5 Lori S. Haskell WSBA #15779  
6 Attorney for Plaintiffs  
7 1900 W. Nickerson St. #209  
8 Seattle, WA 98119  
9 (206) 285-4130  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

DECLARATION OF LORI S. HASKELL  
IN SUPPORT OF MOTION TO WITHDRAW

**Law Office of Lori S. Haskell**  
Fishermen's Terminal  
1900 W. Nickerson St. #209  
Seattle, WA 98119  
Tele 206 285-4130